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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: _____

Attorneys for Plaintiff,
Jake Mandeville-Anthony

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

JAKE MANDEVILLE-ANTHONY,
an individual,

Plaintiff,

v.

THE WALT DISNEY COMPANY;
WALT DISNEY PICTURES;
DISNEY ENTERPRISES, INC.;
PIXAR d/b/a PIXAR ANIMATION
STUDIOS; and DOES 1 - 10,
inclusive,

Defendants.

CASE NO.:

CV11 02137 VBF (JEMx)

COMPLAINT FOR:

1. COPYRIGHT INFRINGEMENT
2. BREACH OF IMPLIED-IN-FACT CONTRACT

DEMAND FOR JURY TRIAL

1 Plaintiff, JAKE MANDEVILLE-ANTHONY, demanding trial by jury,
2 complains and alleges on information and belief as follows:

3 **I.**

4 **PARTIES, JURISDICTION, AND VENUE**

5 **Plaintiff**

6 1. Plaintiff, Jake Mandeville-Anthony, is, and at all relevant times was, a
7 citizen of the United Kingdom and carried on business as an individual author,
8 screenwriter, and actor.

9 **Defendants**

10 2. Defendant The Walt Disney Company is, on information and belief, a
11 Delaware corporation that maintains its principal place of business in the County of
12 Los Angeles, State of California.

13 3. Defendant Walt Disney Pictures is, on information and belief, a California
14 corporation that maintains its principal place of business in the County of Los
15 Angeles, State of California.

16 4. Defendant Disney Enterprises, Inc. is, on information and belief, a
17 Delaware corporation that maintains its principal place of business in the County of
18 Los Angeles, State of California.

19 5. Defendant Pixar, doing business as Pixar Animation Studios, is, on
20 information and belief, a California corporation that maintains its principal place of
21 business in the County of Alameda, State of California. On information and belief,
22 Defendant Pixar is a wholly-owned subsidiary of Defendant The Walt Disney
23 Company.

24 6. Plaintiff is ignorant of the true names and capacities of the Defendants sued
25 herein as Does 1 through 10, inclusive, and therefore sues such Defendants by
26 fictitious names. Plaintiff will seek leave of Court to amend this Complaint to
27 allege their true names and capacities when they have been ascertained. Plaintiff is
28 informed and believes, and thereon alleges, that each of the fictitiously named

1 Defendants was responsible in some manner for the occurrences herein alleged, and
2 that Plaintiff's losses, as herein alleged, were proximately caused by such conduct.

3 **Jurisdiction and Venue**

4 7. Personal jurisdiction is proper because Defendants' principle places of
5 business are within this district and/or the act(s) of infringement complained of
6 herein occurred in this district.

7 8. This Court has subject matter jurisdiction over these federal question claims
8 pursuant to 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a), and 28 U.S.C. §§
9 1331(a). This Court also has supplemental jurisdiction under 28 U.S.C. § 1367
10 because all other claims are so related to those claims over which the Court has
11 original jurisdiction as to form part of the same case or controversy.

12 9. Venue in this district is proper pursuant to 28 U.S.C. § 1391(b) and/or 28
13 U.S.C. §1400(a).

14
15 **II.**

16 **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

17 **Plaintiff's Copyrighted Works: "Cars" and "Cookie and Co."**

18 10. At least as early as 1992, Plaintiff conceived of an idea for a series of
19 motion pictures or a television series/mini-series featuring cartoon cars characters.

20 11. Beginning in 1992, Plaintiff began drafting screenplays, treatments,
21 synopses, and character lists documenting his cartoon cars characters' stories. One
22 work was a three part screenplay titled "Cookie & Co." and was based on the true-
23 life adventure by Michael Owen Perkins and Brian Mullineaux, who won the 1988
24 "London to Sydney Vintage Car Endurance Rally" in a yellow, 1924 open top
25 Vauxhall car called "Cookie." Plaintiff obtained a written assignment of all rights
26 to the story directly from Mr. Perkins.

27 12. Plaintiff's second work was titled "Cars" (alternatively titled "Auto Excess"
28 or "Cars Chaos") and included a treatment, sample screenplay, synopses, 46

1 animated cars characters descriptions, 10 cars characters sketches, and a
2 marketing/merchandising plan. Plaintiff had hired professional artist and car expert
3 Scott Hodges to complete the cartoon sketches, for which Mr. Hodges assigned in
4 writing any and all copyrights to Plaintiff.

5
6 **Defendants' involvement with Plaintiff and its access to "Cars" and**
7 **"Cookie and Co."**

8 13. Beginning in or about the middle of 1992, Plaintiff sent copies of his
9 "Cookie & Co." and "Cars" works to various production companies and movie
10 studios via mail, including to the script department of Defendant The Walt Disney
11 Company. In or about 1994, Plaintiff sent a revised version of his "Cars" work to
12 various production companies and movie studios via mail, including Defendant The
13 Walt Disney Company. In or about 1996, Plaintiff sent a revised version of his
14 "Cookie & Co." work to various production companies and movie studios via mail,
15 including Defendant The Walt Disney Company and its affiliated television studios
16 in New York. A line attributing copyright to Plaintiff was visible on his "Cookie &
17 Co." and "Cars" works either as "Jake Anthony" or his pseudonym "Ian
18 Quartermaine." Plaintiff's works were never returned to him.

19 14. On or about January 6, 1993, Plaintiff met in person with and personally
20 delivered copies of his "Cookie & Co." and "Cars" works to Jim Morris, who held
21 key executive positions with Lucasfilm Limited since 1987.

22 15. On information and belief, John Lasseter, the director/producer and claimed
23 writer of Defendants' "Cars" motion picture, commenced working for Lucasfilm in
24 1983.

25 16. On information and belief, certain divisions of Lucasfilm became
26 Defendant Pixar when the divisions were acquired by Apple co-founder Steve Jobs
27 in 1986.

28 17. On information and belief, Mr. Morris joined Defendant Pixar in 2005 and

1 is currently the general manager of Defendant Pixar.

2 18. On information and belief, Mr. Lasseter is currently the chief creative
3 officer at Defendant Pixar. On information and belief, after Lucasfilm became
4 Pixar in 1986, Mr. Lasseter oversaw all of Pixar's films and associated projects.

5 19. On information and belief, on or about January 24, 2006, Defendant Pixar
6 entered into an agreement with The Walt Disney Company to merge the two
7 companies. On informant and belief, the merger became effective on May 4, 2006
8 wherein, from that time on, Pixar became a wholly-owned subsidiary of The Walt
9 Disney Company.

10

11 **Defendants' "Cars," "Cars 2," "Cars Toons" and Incorporation of Elements**
12 **from Plaintiff's "Cars" and "Cookie and Co."**

13 20. A comparison of Plaintiff's works and Defendants' "Cars," "Cars 2," and
14 "Cars Toons," including without limitation the characters, plots, themes, settings,
15 moods, and sequencing of each, reveals that Defendants' "Cars," "Cars 2," and
16 "Cars Toons" are substantially similar to Plaintiff's works.

17 21. One novel element of Plaintiff's "Cars" was that his cars characters would
18 be "anthropomorphic" (humanoid) with no drivers and, in fact, without humans or
19 reference to humans anywhere in the story or as characters. Defendants' "Cars,"
20 "Cars 2," and "Cars Toons" all incorporate this element. Defendants would later
21 claim this novelty as their own when describing their motion picture "Cars," stating
22 it was a creative concept unlike other animated movies that have come before: a
23 world without humans, where independent, fully anthropomorphized automobiles
24 are the only inhabitants.

25 22. Defendants' "Cars," "Cars 2," and "Cars Toons" also incorporate several
26 other elements from Plaintiff's "Cars" and "Cookie and Co.," most notably:

27 a. The title "Cars" is exactly the same. Further, on information and
28 belief, Defendants had also considered the title "The Yellow Car" for

1 their first motion picture. Plaintiff's "Cookie and Co." work had been
2 professionally bound in book form and had a bright yellow,
3 professionally illustrated cartoon of Cookie the car on the front cover.
4 On information and belief, Defendants had also considered the title
5 "Route 66" for their first motion picture. Within Plaintiff's works, one
6 of the suggested plots is a race on Route 66.

7 b. Plaintiff's oldest cartoon car character was named "Stanley."

8 Defendants used the identical name, "Stanley," for one of their oldest
9 car characters, with a visual appearance substantially similar to
10 Plaintiff's. Both characters are drawn as a Model T Ford.

11 c. Plaintiff's lead character car was "James Aston-Martin," a sports car
12 based on the James Bond character. Defendants' lead character car,
13 "Lightning Mc'Queen," acknowledged by Defendants to have been
14 partially based on Steve McQueen, appears to be an American version
15 of the Plaintiff's lead character car.

16 d. Plaintiff's second lead character car was "Manny Morris," a broken
17 down salvage truck. Defendants' second lead character car, "Mater,"
18 was also a broken down towing and salvage truck. On information and
19 belief, Defendants' Mater character was originally conceived as a
20 pristine condition blue wagon, but it was later changed to an old and
21 broken down truck.

22 e. Plaintiff's third lead character car was "Dr. Damien Daimler," an
23 authority figure. Defendants' third lead character car, "Doc Hudson,"
24 is also a doctor and also an authority figure and appears to be an
25 American version of Plaintiff's third lead character car.

26 f. Plaintiff's supporting female character car was "Miss Thunderbird
27 Ford," a nineteen "fifties," pink, glamorous movie star with big tail
28 fins. One of Defendants' two supporting "Motorola Girls" female

1 character cars was “a nineteen fifties, pink, showgirl with big tail fins.”
2 Defendants’ version of Miss Thunderbird Ford was shown in pre-
3 production as a Motorola Girl showgirl in the Special Features section
4 of the 2008 DVD release of Defendants’ “Cars” but was not used in
5 the film. On information and belief, this character may be used in
6 Defendants’ “Cars 2” or subsequent projects.

- 7 g. Plaintiff’s second female character car was “Leticia Lancia,” a
8 “beautiful cheesecake, Italian movie star with big front bumpers.”
9 Defendants’ “Flo” was their second glamorous showgirl animated
10 cartoon car character. In character and visual description, these two
11 movie star/showgirls animated cartoon cars characters are substantially
12 similar.
- 13 h. One of Plaintiff’s supporting character cars was “Fabrizio Fiat,” a
14 small Italian male car that gets emotional very easily. Defendants
15 featured a supporting character car called “Luigi Fiat,” described as
16 big hearted, gregarious, and excitable.
- 17 i. Another of Plaintiff’s supporting male character cars was “Casper
18 Cadillac,” a rich business car past his prime. One of Defendants’
19 supporting male character cars, “Tex Cadillac,” was also a rich
20 business car past his prime.
- 21 j. Defendants’ “Cars” featured a fast and good looking Italian car called
22 “Michael Shumaker Ferrari.” This character is a composite of
23 Plaintiff’s two Italian fast and good looking male cars: the visual
24 appearance of Plaintiff’s “Frederico Ferrari” and the described
25 personality of Plaintiff’s “Antonio Alfa-Romeo.”
- 26 k. One of Plaintiff’s cartoon character cars was Bruce Holden, described
27 as a cheery Australian station wagon. Defendants’ unnamed version of
28 Bruce Holden was featured on the Menu page of the 2009 release of

1 the Blue Ray DVD version of Defendants' "Cars" but was not used in
2 the film. On information and belief, this character may be used in
3 Defendants' "Cars 2" or subsequent projects.

4 l. One of Plaintiff's cartoon character cars was Toshiro Toyota,
5 described as an aggressive Japanese car who always wants to win,
6 much like a Samurai warrior. On information and belief, Defendants'
7 "Cars 2" includes an extremely aggressive car whose sole aim in life is
8 to win by any means and whose design suggests a Samurai warrior's
9 helmet as the car's roof rack.

10 m. On information and belief, the name Siddeley is used for a character in
11 "Cars 2." The name Siddeley was used by Plaintiff for one of his
12 character cars in his "Cars."

13 n. The plots and settings of Defendants' "Cars" and "Cars 2" are also
14 substantially similar to Plaintiff's works, most notably Plaintiff's
15 "Cookie & Co." Both plots revolve around the lead character
16 interacting with other cars and finding themselves with a number of
17 events intermixed to bring about humor and romance and both with the
18 backdrop of a race. For example, on information and belief,
19 Defendants' "Cars 2" involves an international car race beginning in
20 southeast Asia and ending in Hyde Park, England. A storyline in
21 Plaintiff's "Cookie & Co." involves an international car race beginning
22 in Hyde Park, England and ending in southeast Asia. In addition, on
23 information and belief, "Cars 2" features an Alpine Rally wherein a
24 sample script for an Alpine Rally was well delineated in Plaintiff's
25 "Cars." Also, the backdrop of Route 66 was a major element in
26 Defendants' "Cars" wherein a race on Route 66 was one of the
27 suggested plots in Plaintiff's works.

28 o. Further, certain scenes are nearly identical when Defendants' "Cars" is

1 compared to Plaintiff's works. For example, the first major scene of
2 comedic chaos in each occurs when the fast, lead car gets tangled up in
3 roper or wire, begins dragging things behind it, and wrecking other
4 cars and buildings.

5 p. On information and belief, additional characters, themes, plots, and
6 scenes from Plaintiff's works will be used in Defendants' "Cars 2."
7 For example, on information and belief, Defendants' "Cars 2" involves
8 an espionage/spy action adventure theme for additional excitement,
9 revolving around a James Bond type character and his Miss
10 Money Penny assistant, named Finn McMissile and Holly Shiftwell.
11 On or about March 8, 2011, Defendants released the trailer for their
12 "Cars 2" featuring Lightning McQueen, Mater, and Finn McMissile.
13 Defendants' Finn McMissile and Holly Shiftwell characters are the
14 same as Plaintiff's James Aston-Martin and Jenny Jaguar.

15 23. In or about June 2006, Defendants released their "Cars" motion picture
16 worldwide for theatrical exploitation. Later, in 2006 Defendants released their
17 "Cars" motion picture in DVD format. On information and belief, Defendants
18 Disney Enterprises, Inc. and Pixar are the copyright claimants for Defendants'
19 "Cars" motion picture.

20 24. In or about October 2008, Defendants began releasing "Cars Toons," also
21 known as "Mater's Tall Tales." "Cars Toons" is an animated short television series
22 featuring the characters Mater and Lightning McQueen from the film. Certain
23 episodes have also premiered as theatrical shorts, such as with the 2008 film *Bolt*,
24 and the series has been released in DVD and Blu-ray formats with additional
25 episodes. On information and belief, Defendants Disney Enterprises, Inc. and Pixar
26 are the copyright claimants for Defendants' "Cars Toons" works.

27 25. Defendants' "Cars" and "Cars Toons" have achieved extraordinary
28 commercial success. On information and belief, Defendants' "Cars" has earned

1 well over \$500 million from its motion picture theatrical and DVD release to date.
2 Further, on information and belief, Defendants' entire "Cars" franchise has
3 garnered additional commercial success through sales or licensing of merchandise
4 and promotional items, including without limitation toys and video games, with an
5 estimated \$5 billion in sales.

6 26. To this day, Defendants continue to commercially exploit "Cars," "Cars
7 Toons," and the associated merchandise and promotional items.

8 27. On information and belief, Defendants' "Cars 2" is scheduled for theatrical
9 release on June 24, 2011.

10
11 **III.**

12 **FIRST CAUSE OF ACTION**

13 **COPYRIGHT INFRINGEMENT**

14 **(Against All Defendants)**

15 28. Plaintiff realleges and incorporates by reference the allegations contained in
16 the preceding paragraphs, as though fully set forth herein.

17 29. Plaintiff is responsible for the creation of the works titled "Cars" and
18 "Cookie and Co." that have significant value and have been created at considerable
19 expense.

20 30. Plaintiff is the holder of the pertinent exclusive rights infringed by
21 Defendants, as alleged hereunder, for certain copyrighted works, including but not
22 limited to the works titled "Cars" and "Cookie and Co." (collectively, including
23 derivative works, the "Copyrighted Works"). The Copyrighted Works are the
24 subject of valid Certificate of Copyright Registration, including without limitation
25 Registration Numbers PAu003517316 and PAu003517273, issued by the Register
26 of Copyrights.

27 31. In or about 1992, 1993, 1994, and 1996, Defendants were given access to
28 Plaintiff's Copyrighted Works when Defendants received an in-person presentation

1 from Plaintiff and copies of Plaintiff's Copyrighted Works, personally and via mail,
2 which were, upon information and belief, retained by the Defendants, having never
3 been returned to the Plaintiff.

4 32. Plaintiff is informed and believes that each Defendant, without the
5 permission or consent of the Plaintiff, has used, and continues to use, Plaintiff's
6 Copyrighted Works to create derivative works, including without limitation the
7 motion pictures "Cars" and "Cars 2," the television series "Cars Toons," and the
8 associated merchandise and promotional items, which are all substantially similar to
9 Plaintiff's Copyrighted Works. In doing so, each Defendant has violated the
10 Plaintiff's exclusive rights of preparing derivative works based upon the
11 Copyrighted Works. Each Defendant's actions constitute infringement of the
12 Plaintiff's exclusive rights protected under the Copyright Act of 1976 (17 U.S.C. §
13 101 *et seq.*).

14 33. The foregoing acts of infringement have been willful, intentional, and in
15 disregard of and with indifference to the rights of the Plaintiff.

16 34. As a result of each Defendant's infringement of the Plaintiff's exclusive
17 rights under copyright, the Plaintiff is entitled to relief pursuant to 17 U.S.C. § 504
18 and to its attorneys' fees and costs pursuant to 17 U.S.C. § 505.

19 35. The conduct of each Defendant is causing and, unless enjoined and
20 restrained by this Court, will continue to cause the Plaintiff great and irreparable
21 injury that cannot fully be compensated or measured in money, wherein Plaintiff
22 has no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502 and 503, Plaintiff is
23 entitled to injunctive relief prohibiting each Defendant from further infringing the
24 Plaintiff's Copyrighted Works.

25 ///

26 ///

27 ///

28 ///

IV.

SECOND CAUSE OF ACTION

BREACH OF IMPLIED-IN-FACT CONTRACT

(Against All Defendants)

36. Plaintiff realleges and incorporates by reference the allegations contained in the preceding paragraphs, as though fully set forth herein.

37. In or about 1992, 1993, 1994, and 1996, Defendants were given access to Plaintiff's novel ideas for stories concerning "anthropomorphic" cars characters when they received an in-person presentation from Plaintiff and copies of Plaintiff's written materials related to "Cars" and "Cookie and Co." The ideas were disclosed by Plaintiff for sale to Defendants, and Defendants had an opportunity to reject the submissions before they were made.

38. Plaintiff's disclosure of the ideas for "Cars" to Defendants was conditioned upon Defendants' agreement to pay for the use of the ideas. As a result of Plaintiff's disclosure of his ideas on the terms and conditions alleged above, Defendants and Plaintiff entered into an implied-in-fact contract that required Defendants to compensate Plaintiff for its use of Plaintiff's novel ideas related to "Cars" and to ensure Plaintiff received appropriate credit for any production based on Plaintiff's ideas.

39. Plaintiff has performed each and every obligation required of him pursuant to the terms and conditions of the implied contract with Defendants.

40. Defendants have breached the implied contract by failing and refusing, and continuing to fail and refuse, to pay any compensation to Plaintiff based on the use of the novel ideas in "Cars" and "Cookie and Co." in the development and production of "Cars," "Cars 2," and "Cars Toons" and to take the steps necessary to obtain for Plaintiff a credit, such as "created by," with respect to "Cars," "Cars 2," and "Cars Toons."

41. Plaintiff has demanded compensation based on the use of the novel ideas in

1 "Cars" and "Cookie and Co." but has not received any compensation.

2 42. As a direct and proximate result of Defendants' breach of the implied
3 contract, Plaintiff has been damaged in an amount to be determined at the time of
4 trial, plus interest thereon at a rate to be determined at the time of trial.

5
6 **PRAYER FOR RELIEF**

7 WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

8 1. For entry of preliminary and permanent injunctions providing that each
9 Defendant shall be enjoined from directly or indirectly infringing Plaintiff's rights
10 in the Copyrighted Works, except pursuant to a lawful license or with the express
11 authority of Plaintiff.

12 2. For actual damages or statutory damages pursuant to 17 U.S.C. § 504, at the
13 election of Plaintiff, on the First Cause of Action;

14 3. For general damages on the Second Cause of Action;

15 4. For expenses and costs of suit incurred herein;

16 5. For Plaintiff's reasonable attorneys' fees; and

17 6. For such other and further legal and equitable relief as the Court deems just
18 and proper.

19
20 DATED: March 10, 2011

DUNLAP, GRUBB & WEAVER, PLLC

21
22 By: 

23 Nicholas A. Kurtz
24 Attorneys for Plaintiff,
25 Jake Mandeville-Anthony
26
27
28

DEMAND FOR JURY TRIAL

Plaintiff, Jake Mandeville-Anthony, hereby demands a trial by jury.

DATED: March 10, 2011

DUNLAP, GRUBB & WEAVER, PLLC

By: 

Nicholas A. Kurtz
Attorneys for Plaintiff,
Jake Mandeville-Anthony

#26

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) JAKE MANDEVILLE-ANTHONY		DEFENDANTS THE WALT DISNEY COMPANY; WALT DISNEY PICTURES; DISNEY ENTERPRISES, INC.; PIXAR d/b/a PIXAR ANIMATION STUDIOS; and DOES 1 - 10	
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Nicholas A. Kurtz (SBN 232705) DUNLAP, GRUBB & WEAVER, PLLC 199 Liberty St., SW, Leesburg, Virginia 90210; (703) 777-7319		Attorneys (If Known)	

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%"><tr><td></td><td style="text-align: center;">PTF</td><td style="text-align: center;">DEF</td><td></td><td style="text-align: center;">PTF</td><td style="text-align: center;">DEF</td></tr><tr><td>Citizen of This State</td><td style="text-align: center;"><input type="checkbox"/> 1</td><td style="text-align: center;"><input type="checkbox"/> 1</td><td>Incorporated or Principal Place of Business in this State</td><td style="text-align: center;"><input type="checkbox"/> 4</td><td style="text-align: center;"><input type="checkbox"/> 4</td></tr><tr><td>Citizen of Another State</td><td style="text-align: center;"><input type="checkbox"/> 2</td><td style="text-align: center;"><input type="checkbox"/> 2</td><td>Incorporated and Principal Place of Business in Another State</td><td style="text-align: center;"><input type="checkbox"/> 5</td><td style="text-align: center;"><input type="checkbox"/> 5</td></tr><tr><td>Citizen or Subject of a Foreign Country</td><td style="text-align: center;"><input type="checkbox"/> 3</td><td style="text-align: center;"><input type="checkbox"/> 3</td><td>Foreign Nation</td><td style="text-align: center;"><input type="checkbox"/> 6</td><td style="text-align: center;"><input type="checkbox"/> 6</td></tr></table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.) <input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify): <input type="checkbox"/> 6 Multi-District Litigation <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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V. REQUESTED IN COMPLAINT: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Check 'Yes' only if demanded in complaint.)	
CLASS ACTION under F.R.C.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MONEY DEMANDED IN COMPLAINT: \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) Copyright Infringement - 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a), and 28 U.S.C. §§ 1331(a)					
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VII. NATURE OF SUIT (Place an X in one box only.)					
OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

FOR OFFICE USE ONLY: Case Number: _____

CV11 02137

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

#27

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	United Kingdom

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
The Walt Disney Company - Los Angeles County Walt Disney Pictures - Los Angeles County Disney Enterprises, Inc. - Los Angeles County	Pixar (doing business as Pixar Animation Studios) - County of Alameda

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.

Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date March 10, 2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JAKE MANDEVILLE-ANTHONY, an individual

CASE NUMBER

PLAINTIFF(S)

CV11 02137 VBF (JEMx)

v.

THE WALT DISNEY COMPANY; WALT DISNEY
PICTURES; DISNEY ENTERPRISES, INC.; PIXAR d/b/a
PIXAR ANIMATION STUDIOS; and DOES 1 - 10, inclusive

SUMMONS

DEFENDANT(S).

TO: DEFENDANT(S): THE WALT DISNEY COMPANY; WALT DISNEY PICTURES;
DISNEY ENTERPRISES, INC.; PIXAR d/b/a PIXAR ANIMATION STUDIOS

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Nicholas A. Kurtz, whose address is 199 Liberty St., SW, Leesburg, Virginia 90210. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: MAR 14 2011

By: CHRISTOPHER POWERS
Deputy Clerk

(Seal of the Court)



1181

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

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Clerk, U.S. District Court

Dated: _____

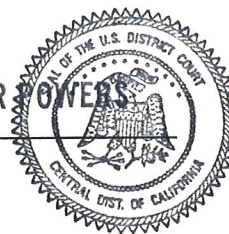
MAR 14 2011

By: _____

CHRISTOPHER POWERS

Deputy Clerk

(Seal of the Court)



1181

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

COPY